

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

JANE DOE,

CASE NO: 1:25-cv-20757-JB/Torres

Plaintiff,

v.

STEVEN BONNELL II,

Defendant.

_____ /

JOINT SCHEDULING REPORT PROPOSED BY THE PARTIES

Plaintiff, Jane Doe, and Defendant, Steven Bonnell II, through their respective undersigned counsel, pursuant to Rule 16.1(b) of the Local Rules for the Southern District of Florida and the Court's February 19, 2025 Paperless Order [D.E.4], certify that they met on April 1, 2025, and conferred in good faith about all matters required and hereby submit this Joint Scheduling Report.

Information required by S.D. Fla. L.R. 16.1(B):

(A) Likelihood of Settlement.

The parties engaged in initial settlement discussions, however it was not productive. The likelihood of settlement is not yet clear.

(B) Likelihood of Appearance in the Action of Additional Parties.

At this point in time it does not appear that either Party will introduce any additional parties into the action, but each Party reserves her/his right to do so.

(C) Discovery Schedule. The parties propose the following pretrial discovery schedule:

April 4, 2025	The Parties shall furnish their initial disclosures pursuant to Fed. R. Civ. P. 26. The Parties are under a continuing obligation to furnish supplements within ten (10) days of receipt or other notice of new or revised information.
---------------	---

July 10, 2025	The Parties shall file motions to amend pleadings or join Parties.
May 5, 2025	The Parties shall serve written discovery requests, with answers to be served within 30 days.
October 1, 2025	The parties shall complete all fact discovery and depositions.
October 16, 2025	The Parties shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
November 16, 2025	The Parties shall exchange rebuttal expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
December 16, 2025	The Parties shall complete all expert discovery and depositions.
December 23, 2025	The Parties shall complete mediation and file a mediation report with the Court.
January 30, 2026	The Parties shall file all dispositive pre-trial motions and memoranda of law, as well as any motions to exclude or limit proposed expert testimony must be filed. Any <i>Daubert</i> motion shall be accompanied by appropriate affidavits. If any party moves to strike an expert affidavit filed in support of a motion for summary judgment [for reasons stated in <i>Daubert v. Merrill Dow Pharmaceuticals, Inc.</i> , 509 U.S. 579 (1993)], the motion to strike shall be filed with that party's responsive memorandum.
March 30, 2026	The Parties shall file all pretrial motions and memoranda of law.
April 17, 2026	The Parties shall file their deposition designations.
May 5, 2026	The Parties shall file a Joint Pretrial Stipulation.
May 8, 2026	The Parties shall file a joint set of proposed jury instructions and joint proposed verdict form.

(D) Proposals for the Formulation and Simplification of Issues.

At this time, the parties do not have any proposals for the formulation and simplification of any issues.

As the case progresses, the parties will, if appropriate, in good faith, confer to discuss proposals for the formulation and simplification of issues in this case.

(E) Necessity of Amendments to Pleadings.

At this stage, the necessity of amendments to the pleadings is unknown. Pleadings may need to be amended if a third party is brought into the action or if other matters appear which necessitate such amendments.

(F) Possibility of Obtaining Admissions Which Will Avoid Unnecessary Proof and Stipulations Regarding Authenticity and Other Matters.

At this stage, the possibility of obtaining admissions which will avoid unnecessary proof and stipulations regarding authenticity and other matters is unknown. The parties, however, have been in communication on all matters related to this case and will continue to have such communication with the potential that such admissions and stipulations may be garnered.

(G) Suggestions for the Avoidance of Unnecessary Proof and of Cumulative Evidence.

The parties will work together to obtain admissions and stipulations that will avoid unnecessary proof and presentation of cumulative evidence at trial.

(H) Referral of Matters to Magistrate Judge.

The parties object to a referral of the trial to the Magistrate Judge.

(I) Preliminary Estimate of the Time Required for Trial.

The parties estimate the trial will take between five (5) to seven (7) days.

(J) Trial Date.

The Parties propose the following trial date: May 18, 2026.

(K) Issues about ESI.

None at this time.

(L) Other Information Helpful to the Court in Setting the Case for Status or Pretrial Conference.

At this time, the parties are unaware of any other information that might be helpful to the Court in setting the case for status or pretrial conference.

April 3, 2025

Respectfully submitted jointly,

**BILZIN SUMBERG BAENA
PRICE & AXELROD LLP**
1450 Brickell Avenue, Suite 2300
Miami, Florida 33131
Tel.: (305) 374-7580
Fax: (305) 374-7593

By: /s/ Robert L. Raskopf
Robert L. Raskopf, Esq.
Florida Bar No.: 1040022
rraskopf@bilzin.com
Patricia M. Patino, Esq.
Florida Bar No.: 1007702
ppatino@bilzin.com

and

BERK BRETTLER LLP
9119 West Sunset Blvd.
West Hollywood, CA 90069-3106
Tel: (310) 278-2111

By: /s/ Andrew B. Brettler
Andrew Brad Brettler, Esq.
California Bar No.: 262928
abrettler@berkbrettler.com
Jake A. Camara, Esq.
California Bar No.: 305780
jcamara@berkbrettler.com
(admitted *pro hac vice*)

Counsel for Defendant Steven K. Bonnell II

**SANCHEZ-MEDINA GONZALEZ
QUESADA LAGE GOMEZ & MACHADO**
201 Alhambra Circle, Suite 1205
Coral Gables, Florida, 33134
Tel.: (305) 377-1000
s/ Carlos A. Garcia Pere
CARLOS A. GARCIA PEREZ
Florida Bar No. 10689
Primary E-Mail: cgarciaperez@smgqlaw.com
Secondary E-Mail: angie@smgqlaw.com

JSP LAW, LLC
4819 W. Blvd. Ct.
Naples, Florida 34103
Tel.: 305-299-4759

s/ Joan Schlump Peters
Joan Schlump Peters (admitted *pro hac vice*)
Email: petersjoan@bellsouth.net

Counsel for Plaintiff